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MEMO ENDORSED

Hon. Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Zan Sun et al. v. Shen Yun Performing Arts, et al.*, Civil Action No. 7:25-cv-3185 (JGLC)

July 18, 2025

Dear Judge Clarke:

We represent Defendants in the above-captioned action. We write along with attorneys for Plaintiffs to respectfully request an adjournment of the initial pretrial conference, currently scheduled for July 30, 2025, at 12:30 p.m. (*see* ECF Doc. No. 15), as well as an adjournment of the requirement to submit a joint letter and Civil Case Management Plan and Scheduling Order, pursuant to Paragraph 3(c) of the Court's Individual Rules and Practices, which is currently due by July 23, 2025 (*id.*).

Given that Plaintiffs plan to amend their complaint by the FRCP 15(a)(1)(B) deadline of July 28, 2025, the parties respectfully request that the Court postpone the initial pretrial conference until October, after Defendants have had time to respond to the amended complaint, and, presuming Defendants move to dismiss again, after Plaintiffs have had a chance to oppose. (*See* the request below regarding a briefing schedule.)

Pursuant to this Court's Individual Rules and Practices and Civil Cases, Rule 2(e), the parties hereby offer mutually agreeable dates for rescheduling the initial pre-trial conference: any date after October 6 and before October 31, **except** October 24 and the afternoons of Wednesdays October 8, 15, 23 and 30. The parties will be happy to submit the joint letter a week ahead of whatever date is selected.

The parties have conferred on a briefing schedule and respectfully request that the Court so order it:

- Defendants' motion to dismiss Plaintiffs' complaint: due September 2
- Plaintiffs' opposition to Defendants' motion to dismiss: due October 3
- Defendants' reply to Plaintiffs' opposition: due October 17

Should Your Honor require any additional information from the parties, we would be happy to supply it.



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Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Steven M. Schneebaum'.

Steven M. Schneebaum
One of the Attorneys of Record for Defendants
(on behalf also of McAllister Olivarius, Counsel for Plaintiffs)

Cc: All counsel of record, through ECF

Application GRANTED. The proposed briefing schedule is adopted. The conference scheduled for July 30, 2025 is ADJOURNED to **October 15, 2025** at 10:00 a.m. The conference will be held remotely by Microsoft Teams. Counsel will receive Microsoft Teams log-in credentials at the email addresses listed on the docket. The public listen-only line may be accessed by dialing: 646-453-4442 | Access Code: 311267240#. Parties to submit proposed case management plan by **October 8, 2025**. The Clerk of Court is directed to terminate ECF No. 32.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Jessica Clarke'.

JESSICA G. L. CLARKE
United States District Judge
Dated: July 21, 2025
New York, New York